

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PAULA PAGONAKIS,)	
)	
Plaintiff,)	
v.)	
)	Case No.: 06-027 (SLR)
EXPRESS, LLC, a/k/a)	
LIMITED BRANDS, INC.,)	
)	
Defendant.)	

**MOTION OF DEFENDANT EXPRESS, LLC
FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Express, LLC ("Express"), by and through its undersigned attorneys, hereby moves this Court for summary judgment in its favor on all Counts of the Complaint filed by Plaintiff Paula Pagonakis because no genuine issues of material fact exist for trial and Express is entitled to judgment as a matter of law. A Memorandum in Support, the Declarations of Jennifer Hinkle and Rosie Rock, and portions of the deposition transcripts of Paula Pagonakis, Jennifer Hinkle and Elise Zapp are attached hereto in support of this Motion.

Respectfully Submitted,

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